

Exhibit A

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

CORY SPENCER, an individual; DIANA)
MILENA REED, an individual; and)
COASTAL PROTECTION RANGERS, INC., a)
California non-profit public benefit)
corporation,) Case No.
) 2:16-cv-02129-SJO-RAO
Plaintiffs,)
)
vs.)
)
LUNADA BAY BOYS, et al.,)
)
Defendants.)
_____)

VIDEOTAPED DEPOSITION OF DIANA MILENA REED
VOLUME II
Santa Monica, California
Tuesday, October 25, 2016

REPORTED BY:
Jimmy S. Rodriguez
CSR No. 13464

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Videotaped deposition of DIANA MILENA REED, Volume II,
taken before Jimmy Rodriguez, a Certified Shorthand
Reporter for the State of California, with principal
office in the County of Orange, commencing at 9:24 a.m.,
Tuesday, October 25, 2016 at Premier Business Centers -
The Water Garden, 2425 Olympic Boulevard, Suite 4000,
Santa Monica, California.

1 company or not. I was 18 and I was just out of high 09:29
2 school, so it's hard for me to remember. 09:29
3 Q As you sit here today, do you have any 09:29
4 recollection of acting in any -- any production of 09:29
5 Visual Inspiration? 09:30
6 A Possibly, yeah, I mean, I don't really 09:30
7 remember, you know. 09:30
8 Q As you sit here today, you don't have a 09:30
9 recollection; is that correct? 09:30
10 A Yeah, I don't remember. 09:30
11 Q Putting aside Visual Inspiration, have you 09:30
12 acted in any -- in any movie -- large, small, 09:30
13 homemade, anything like that? 09:30
14 A Yeah, I have. 09:30
15 Q How many times? 09:30
16 A I don't remember. I mean, nothing large. 09:30
17 Mostly just my own little projects or things I did 09:30
18 with my friends. Yeah, not anything significant 09:30
19 that I can think of. Student films. 09:30
20 Q Student films? 09:30
21 A As well. 09:30
22 Q Have you ever acted in anything that was 09:30
23 distributed in any fashion for sale? 09:30
24 A Not that I would know of. 09:30
25 Q Have you ever been sued for fraud? 09:30

1 A Not that I know of, no. 09:31

2 Q Have you ever had a judgment entered 09:31

3 against you with regard to a lawsuit in which you 09:31

4 were sued for fraud? 09:31

5 A Not that I'm aware of, no. 09:31

6 Q Have you ever been served with a judgment 09:31

7 in which -- judgment in a case in which you were 09:31

8 sued for fraud? 09:31

9 A Not to my knowledge. 09:31

10 Q Have you ever been sued by a person by the 09:31

11 last name of Rubin, R-u-b-i-n? 09:31

12 A I haven't heard of that person, no. 09:31

13 Q Have you ever been sued by the entity 09:31

14 called Superfin, S-u-p-e-r-f-i-n, for fraud in the 09:31

15 L.A. Superior Court? 09:31

16 A Not that I know of, no. 09:31

17 Q Have you ever -- let me ask you this: Do 09:31

18 you recall an entity called Superfin? 09:31

19 A I do not, no. 09:31

20 Q Have you ever had a judgment entered 09:31

21 against you by the Berger Trust in Santa Monica 09:31

22 Municipal Court? 09:32

23 A Not that I know of. 09:32

24 Q Have you ever had a judgment entered 09:32

25 against you in Santa Monica Municipal Court? 09:32

1 A Not that I know of. I think my -- if it's 09:32
2 related to my divorce, I think that was filed in 09:32
3 L.A., I'm not sure. 09:32
4 Q Have you ever been sued for breach of 09:32
5 contract? 09:32
6 A Not that I know of, no. 09:32
7 Q Have you ever been sued for negligent 09:32
8 misrepresentation? 09:32
9 A No, not that I know of. 09:32
10 Q Did your -- are you aware that your 09:32
11 soon-to-be ex-husband has been sued several times? 09:32
12 A I have read the press articles about him 09:32
13 recently, and, you know, it was very surprising for 09:32
14 me to hear. And, you know, I don't really know what 09:32
15 the truth is behind his business because I wasn't 09:32
16 actively involved in his proceedings. 09:32
17 Q Would you be surprised to hear that you 09:32
18 had been sued for fraud in court with regard to any 09:33
19 of your dealings with your soon-to-be ex-husband's 09:33
20 business? 09:33
21 MR. FRANKLIN: Objection, argumentative. 09:33
22 THE WITNESS: I would be surprised if it 09:33
23 included my name, yes, I would be very surprised. 09:33
24 BY MS. HEWITT: 09:33
25 Q Yes, okay. 09:33

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I, DIANA MILENA REED, do solemnly declare under penalty of perjury that the foregoing is my deposition under oath; that these are the questions asked of me and my answers thereto; that I have read same and have made the necessary corrections, additions, or changes to my answers that I deem necessary.

It witness thereof, I hereby subscribe my name this day of _____, 2016.

WITNESS SIGNATURE

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Certification of Court Reporter
Federal Jurat

I, the undersigned, a Certified Shorthand Reporter of the State of California do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; that any witnesses in the foregoing proceedings, prior to testifying, were placed under oath; that a verbatim record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; further, that the foregoing is an accurate transcription thereof.

That before completion of the deposition, a review of the transcript [x] was [] was not requested. I further certify that I am neither financially interested in the action nor a relative or employee of any attorney of any of the parties.

IN WITNESS WHEREOF, I have this date subscribed my name.

Dated: November 7, 2016



Jimmy Rodriguez, RPR

Certificate Number 13464